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EX PARTE



**United States Telephone Association**

1401 H Street, N.W., Suite 600  
Washington, D.C. 20005-2136  
(202) 326-7300  
(202) 326-7333 FAX

March 4, 1994

**RECEIVED**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street NW - Room 222  
Washington, DC 20554

**MAR - 4 1994**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: Ex Parte Meeting  
CC Docket No. 92-296

Dear Mr. Caton:

On March 4, 1994, Kathleen M. Woods, Thomas Whittaker, and Michael Crumley, representing the United States Telephone Association (USTA), met with Rudy Baca of Commissioner Quello's office regarding the above referenced docket. The discussion centered on the items outlined in the attachment provided, and the viewpoints expressed were consistent with USTA's written comments before the Commission.

An original and a copy of this ex parte meeting notice are being filed in the Office of the Secretary on March 4, 1994. Please include it in the public record of this proceeding.

Respectfully submitted,

A handwritten signature in cursive script that reads "Linda L. Kent".

Linda L. Kent  
Acting General Counsel

cc: R. Baca

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**USTA Proposals on  
Depreciation Simplification**

**I. The Commission should adopt the Price Cap Carrier Option**

-It is the most consistent with the Commission's goals of simplification, administrative savings and flexibility.

-It removes the disincentives to invest in the telecommunications infrastructure.

-It provides for continued oversight of depreciation.

**II. In the meantime the Commission should adopt three modifications to the Basic Factor Range Option to achieve short term simplification.**

-Allow all subject carriers to use the approved ranges.

-Eliminate the requirement to produce a traditional detailed study to use the presumed reasonable ranges if either factor is currently outside of the ranges.

-Eliminate the requirement to continue to file curve data for simplified accounts if no change in curve shape is requested.

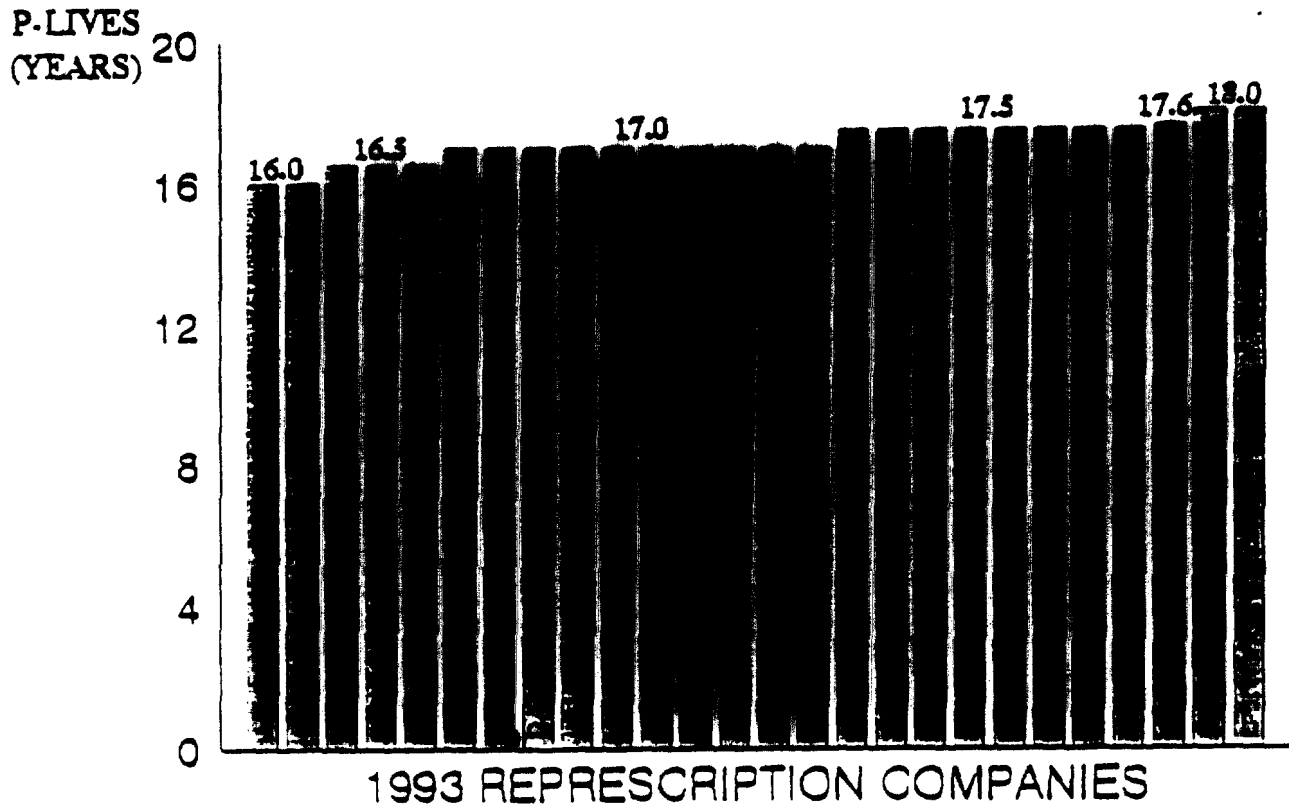
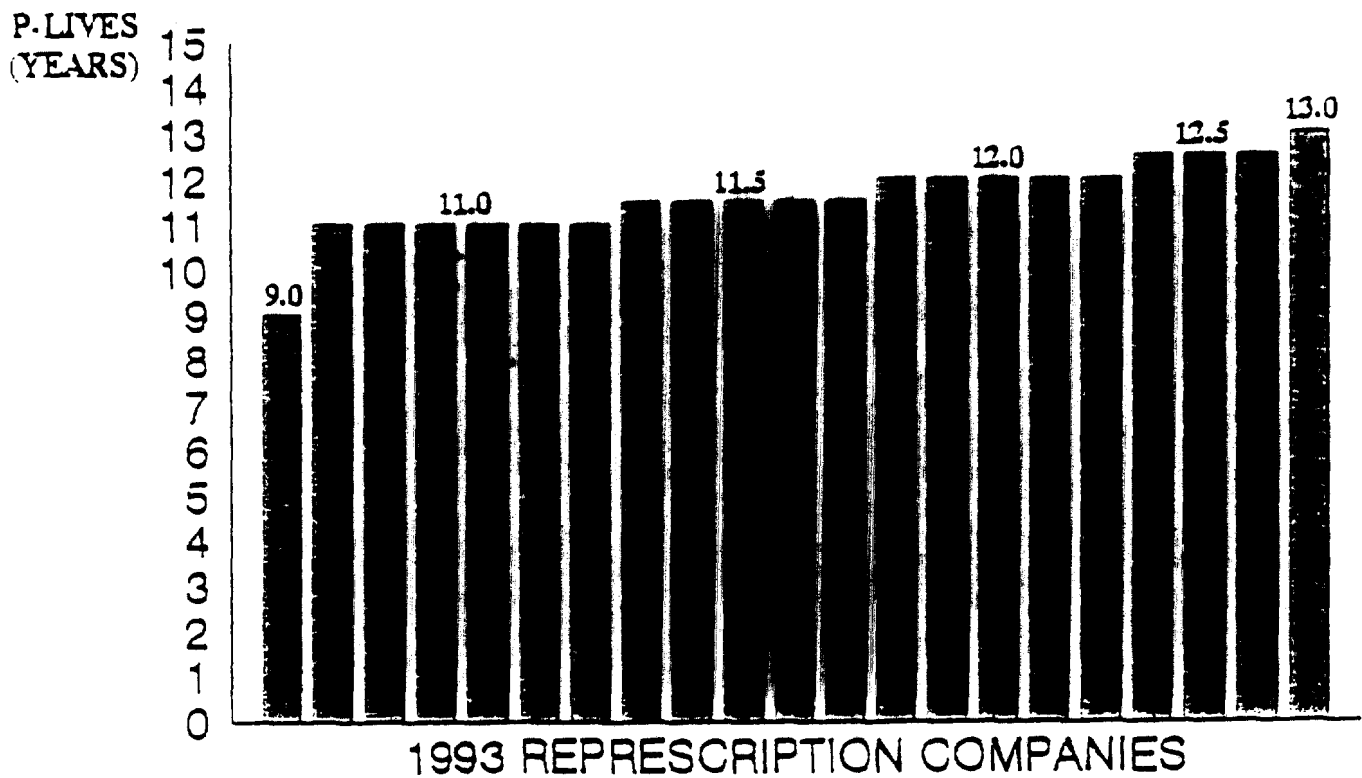
**III. Set appropriate ranges.**

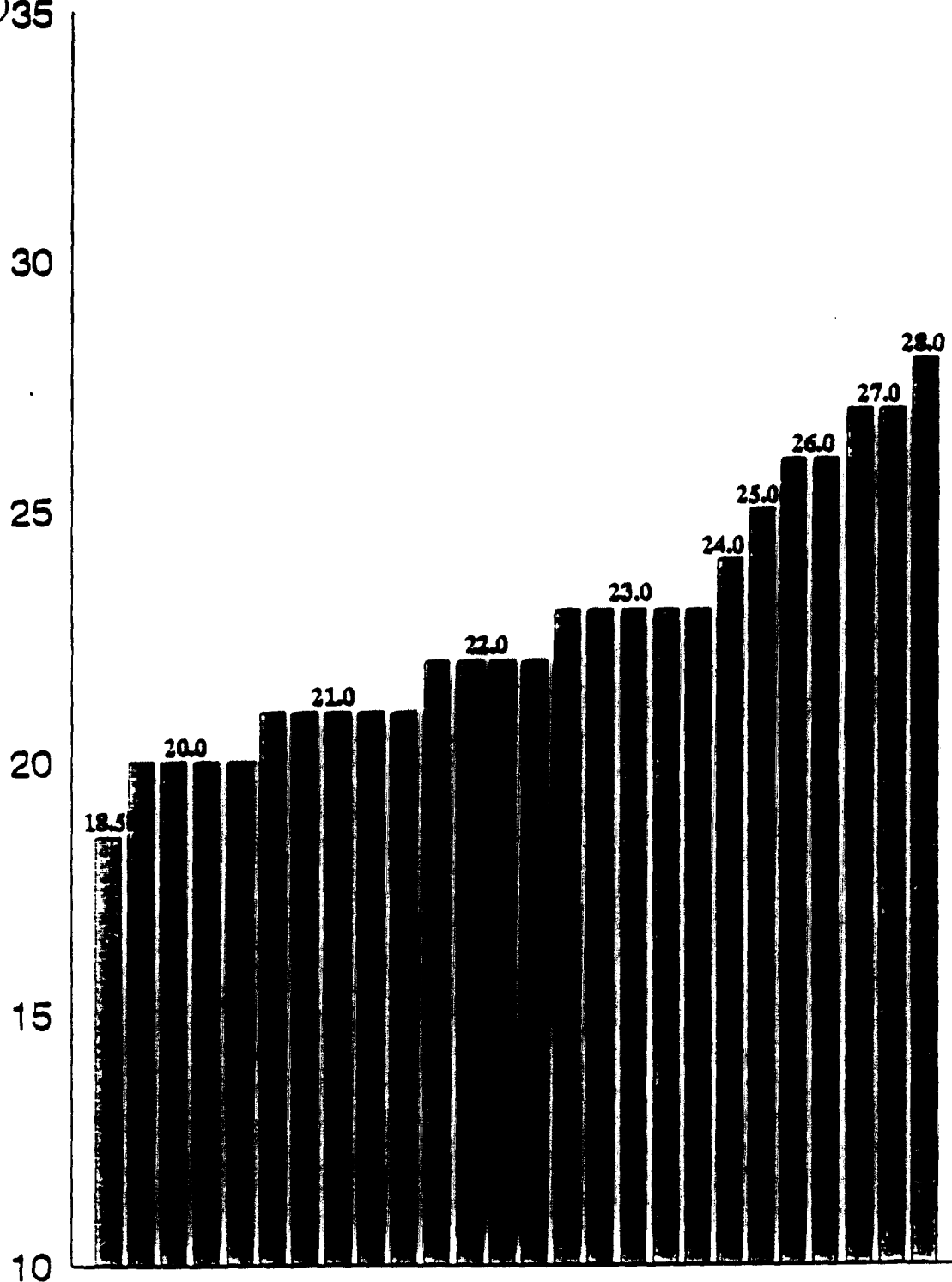
-Consistent with the intent stated in the order, set ranges for the remaining accounts now, especially Digital Switching, Digital Circuit, Buried and Aerial cable (see Attachments 1, 2 and 3).

-USTA provided in its comments ranges and the required support for all accounts.

-The proposed life ranges in the OIC for Underground Copper and Fiber Cables are inconsistent with development of the national information infrastructure as well as the lives used by other companies and industries.

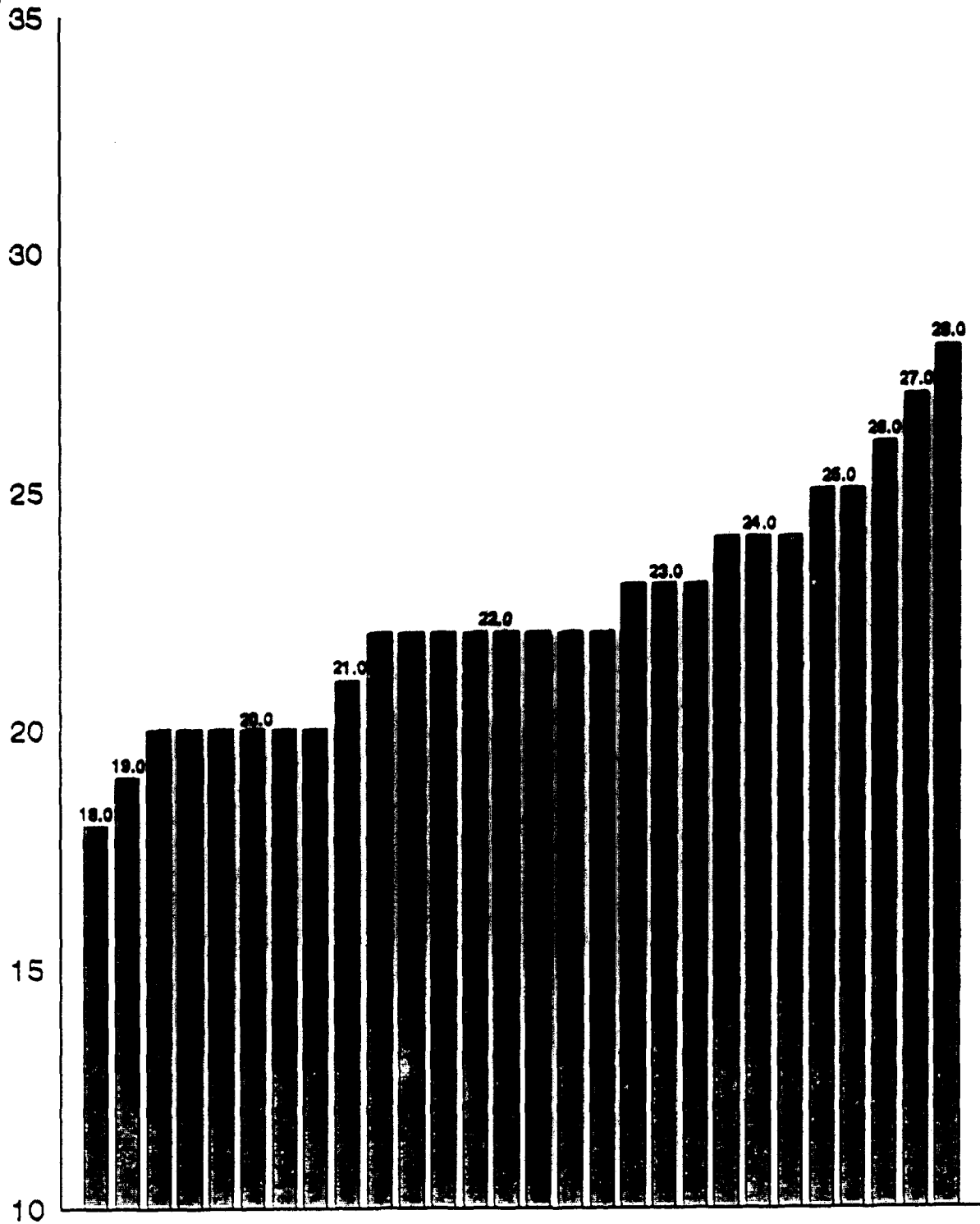
-Underground copper should have a minimum life of 15 years, not 25 and fiber should also be 15 years, but in no case more than 20 years (see Attachments 4 and 5).

**ACCOUNT 2212 - DIGITAL ESS****ACCOUNT 2232.2 - DIGITAL CIRCUIT**

**ACCOUNT 2423 BURIED CABLE - COPPER****P-LIVES  
(YEARS)****1993 REPRESRIPTION COMPANIES**

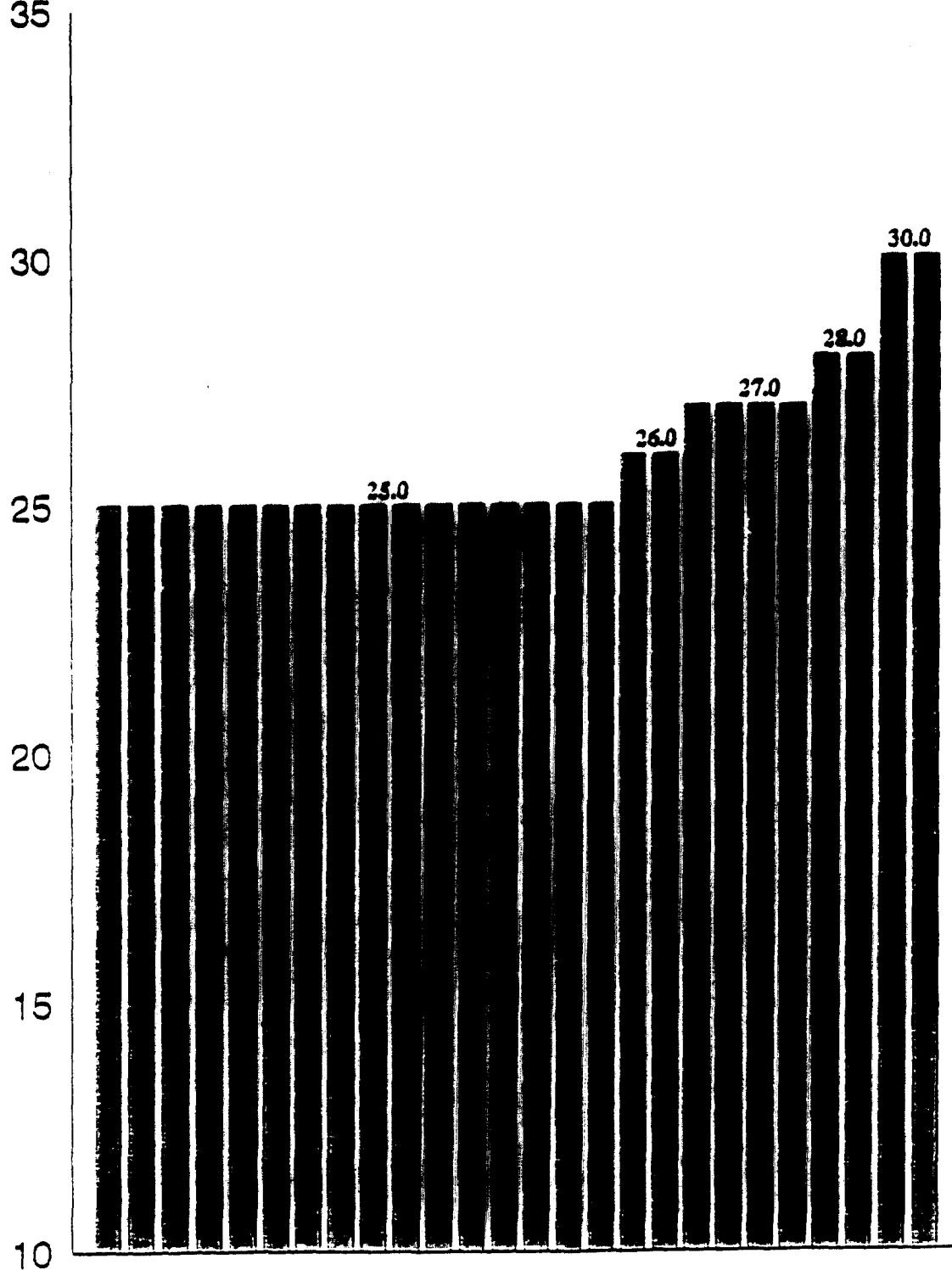
# ACCOUNT 2421 AERIAL CABLE - COPPER

P-LIVES  
(YEARS)



1993 REPRESRIPTION COMPANIES

## ACCOUNT 2422 UNDERGROUND CABLE - COPPER

P-LIVES  
(YEARS)

1993 REPRESRIPTION COMPANIES

## Underground Copper Cable

